

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
Amendment to the Commission's Rules)
With Regard to Commercial Operations) Docket No. 12-354
In the 3550---3650 MHz Band)

COMMENTS OF SPECTRUM BRIDGE, INC.

April 5, 2013

This proceeding has yielded positive contributions and significant support for spectrum sharing in the 3.5 GHz band. We strongly encourage the FCC to continue to facilitate the dialog between all interested and affected parties. A recurring and important theme of the comments and recent FCC workshop (on March 13, 2013) is to move (how do you 'move' something that has no 'home' yet?) policy decisions from radio device(s) to a cloud based management or database platform. Moving these decisions to a centralized managed solution is good policy for all future spectrum access solutions where spectrum is shared, even if this system only manages the policy not the use of the spectrum.

There have been various methods proposed to manage spectrum in the 3.5 GHz and other bands (2-tier, multi-tier, etc...), but regardless of the specific implementation, a cloud-based spectrum management vehicle affords the most flexibility. Spectrum Bridge proposed a solution that can support a multi-tier implementation, where the

number of tiers could range between 2-n. This flexibility will provide the means to adapt rules and policies that address the present and evolving future needs of incumbent and secondary users while, at the same time, providing the most flexibility and optimal use of the spectrum.

A number of comments expressed concern about the privacy and security of data related to Federal use of the spectrum. Spectrum Bridge believes that adequate protection can be provided such that only the data necessary to enable sharing (interference acceptable to Federal systems and interference created by Federal systems) is in the public domain and even this can be restricted to the approved spectrum management systems.

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